

This Form 99 submission is in response to the Commission's letter dated May 5, 2010. There were no payments for payroll on Schedule B for Line 30(b) because during the periods covered in the February, March and April Monthly reports no one worked more than 25% of their time on activity in connection with a federal election. The allocation transfers reported on the February, March and April Monthly reports contain allocable expenses from November and December 2009, as is allowable as part of the 60-day allocation transfer window.
